

EXHIBIT C

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Attorney for Defendant
KENNETH W. MATTSON

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH W. MATTSON,

Defendant.

Case No. 4:25-cr-00126-JST

**DECLARATION OF KENNETH W.
MATTSON IN SUPPORT OF
DEFENDANT'S MOTION TO MODIFY
PRE-TRIAL ASSET RESTRAINT**

Date: July 18, 2025
Time: 2:00 p.m.
Judge: Hon. Jon S. Tigar
Ctroom: 6 – 2nd Floor

Indictment Filed: May 13, 2025
Trial Date: None set

I, Kenneth W. Mattson, declare as follows:

1. I own or control residential properties at the following addresses:

a. 62 Farragut Avenue, Piedmont, California 94610; and

b. 1834-1836 Ocean Front, Del Mar, California 92014.

2. These two properties have an estimated, combined value of approximately \$21 million.

3. Another residential property titled in my wife's name is located at 210 La Salle Avenue, Piedmont, California 94610.

1 4. The La Salle Avenue property has an estimated value of approximately \$4 million.

2 5. I am not able to dispose of or otherwise control assets held by KS Mattson Partners
3 LP ("KSMP") because KSMP is currently in bankruptcy proceedings.

4 6. I understand that KSMP is controlled by Robbin L. Itkin, a court-appointed
5 independent director and Responsible Individual.

6 7. I desire to have Randy Sue Pollock and William Frentzen represent me as my
7 defense counsel during the course of these criminal proceedings and through trial.

8 8. At present, I have access only to assets of a nominal value to pay for counsel.
9 These assets are insufficient to pay my chosen counsel through trial. I am unable to retain the
10 counsel of my choice with the assets currently available to me.

11 9. I can only afford to hire counsel if I am able to sell one or more of the properties
12 that I own or control or that my wife owns or controls. Lis pendens on the properties I own or
13 control and the government's request to post a property as bail currently impair or prevent me
14 from attempting to sell these properties.

15 10. As part of my release conditions, I am required to notify the Court within 24 hours
16 of every transaction exceeding \$5,000. I understand that this means I will need to notify the
17 Court within 24 hours every time that I pay my attorneys.

18 I declare under penalty of perjury of the laws of the United States of America that the
19 foregoing is true and correct.

20
21 Dated: June 25, 2025


Kenneth W. Mattson